

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FELISHATAY ALVARADO	:	
Plaintiff	:	Civil Action No. 22-3763
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, <i>et al.</i>	:	

ORDER

AND NOW, on this _____ day of _____, 2024, upon consideration of Plaintiff's Motion *in Limine* to Preclude any Reference to Plaintiff's Work History, and any response thereto, it is hereby **ORDERED** that Plaintiff's Motion is **GRANTED**, and that the Defendants are precluded from making any reference to Plaintiff's work history at the trial of this matter.

BY THE COURT:

John F. Murphy, District Judge

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CITY OF PHILADELPHIA, <i>et al.</i>	:	

PLAINTIFF’S MOTION *IN LIMINE* REGARDING STATUS OF PLAINTIFF’S SERVICE ANIMAL

Plaintiff, Felishatay Alvarado (“Ms. Alvarado”), by and through her undersigned counsel, hereby respectfully submits Plaintiff’s Motion *in Limine* to Preclude any Reference to Plaintiff’s Work History. In support of this Motion, Plaintiff incorporates the attached Brief.

Respectfully submitted,

/s/ Keith West
Keith West, Esquire
VICTIMS’ RECOVERY LAW CENTER
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Attorney for the Plaintiff

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**BRIEF IN SUPPORT OF
PLAINTIFF’S MOTION *IN LIMINE* REGARDING STATUS OF PLAINTIFF’S SERVICE ANIMAL**

This civil action is brought under 42 U.S.C. § 1983. On June 4, 2021, Plaintiff, Felishatay Alvarado (“Ms. Alvarado”), was the victim of an unreasonable search and seizure of her home, person, and property (including the summary execution of her service dog, Akuma), by the SWAT Unit of the Philadelphia Police Department, who entered her apartment without having a valid warrant.

Plaintiff respectfully moves this Court for an order precluding any reference to Plaintiff’s work history during the trial, because Plaintiff is not making a wage claim in this matter. A plaintiff’s work history is generally irrelevant in a personal injury action where the plaintiff is not making a claim for lost wages. See Kansky v. Showman, 2011 U.S. Dist. LEXIS 38814, at *3-4; 2011 WL 1362245 (M.D. Pa. Apr. 11, 2011). Any effort by the Defendants to probe Plaintiff’s work history, if not altogether irrelevant, would confuse the issues of importance to this case and potentially be unfairly prejudicial to Plaintiff.

WHEREFORE, Plaintiff respectfully requests for the Court to *grant* the instant Motion, in the form of the attached proposed Order.

Respectfully submitted,

/s/ Keith West

Keith West, Esquire

VICTIMS' RECOVERY LAW CENTER

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Attorney for the Plaintiff

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CERTIFICATE OF SERVICE

I, Keith West, Esquire, on this date, by electronic filing, caused a true and correct copy of Plaintiff's above Motion *in Limine* to be served on the Defendants.

Jonah Santiago-Pagan, Esquire
Emily Hoff, Esquire
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
Attorney for Defendants

Respectfully submitted,

/s/ Keith West
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